

INITIAL CONFERENCE QUESTIONNAIRE

1. Deadline for all Rule 26(a)(1) disclosures (if later than the date of the initial conference, please explain why on a separate page): 3/25/20
2. Deadline for first request for production of documents and first request for interrogatories: 30 days from decision on MTD
- 2(a). Additional interrogatories needed, if any, beyond the 25 permitted under the federal rules for: plaintiff(s) ____ ; defendant(s) ____
3. Date for completion of any joinder of additional parties and amendment of the pleadings: 90 days from decision on MTD
- 3(a). Number of proposed additional parties to be joined, if any, by: plaintiff(s) ____ ; defendant(s) ____
4. Number of depositions by plaintiff(s) of: parties ____ ; non-parties ____
5. Number of depositions by defendant(s) of: parties 4 ; non-parties 5
6. Date of status conference (joint status report due two business days in advance): _____
7. Date for completion of factual discovery: 180 days from decision on MTD
8. Are expert witnesses needed? Yes ____ No X
- 8(a). Number of expert witnesses, if any, of plaintiff(s): medical ____ ; non-medical ____
- 8(b). Date for completion of those expert reports: _____
- 8(c). Number of expert witnesses, if any, of defendant(s): medical ____ ; non-medical ____
- 8(d). Date for completion of those expert reports: _____
9. Date for completion of expert discovery: _____
10. Date of pretrial conference (brief *ex parte* statements of settlement position due via email two business days in advance): _____
11. Types of contemplated dispositive motions by plaintiff(s) and dates for filing of those motions: _____

- Motions to Dismiss to be filed
by Defendants on 3/25/2020
Summary Judgment
60 days of the close of discovery
12. Types of contemplated dispositive motions by
defendant(s) and dates for filing of those motions:
13. Have counsel reached any agreements regarding
electronic discovery? (If so, please describe at
the initial conference.) Yes ☐ No ☒
14. Have counsel reached any agreements for disclosure
of experts' work papers (including drafts) and
communications with experts? (If so, please describe
on a separate page.) Yes ☐ No ☒
15. Will the parties unanimously consent to trial before a
magistrate judge pursuant to 28 U.S.C. §636(c)? (If
any party declines to consent, answer no but do not
indicate which party declined.) Yes ☐ No ☒